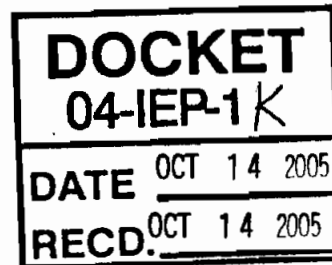




MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office



October 14, 2005

California Energy Commission
Dockets Unit
Attn: Dockets 04-IEP-1K
1516 9th St., MS-4
Sacramento, CA 95814-5512

Dear Sir or Madam:

Metropolitan's Comments to the California Energy Commission's 2005 Integrated Energy Policy Report -- Docket number 04-IEP-1K (2005 IEPR)

Metropolitan appreciates the time, effort, and consideration that the California Energy Commission (CEC) has exerted towards managing California's increasingly stressed energy systems as well as maintaining the state's goal of ensuring adequate, affordable, and reliable energy. Metropolitan believes that there are many opportunities through cooperative voluntary efforts where energy and water suppliers can further reduce California's long-term energy needs.

We support the CEC's statewide policy goal of achieving competitively priced and stable energy supplies because these outcomes are fundamental to Metropolitan's ability to provide reliable water supplies at a reasonable cost. Metropolitan places a high value on this goal and we welcome opportunities to work with the CEC in implementing best management strategies.

Energy strategies and water conservation are very important aspects in planning and managing water supply systems. Some of the most sophisticated energy-efficiency strategies in California are embedded within existing and future water projects. Additionally, Metropolitan and its member agencies are currently making appreciable financial investments in energy savings through water conserving retrofits at no cost to California's energy suppliers.

Below are some opportunities that we would like to highlight:

- **State Water Project Comprehensive Strategies:**
The CEC and interested stakeholders such as the California Department of Water Resource (DWR), state water contractors, and Metropolitan could collaborate to expand existing comprehensive energy strategies for State Water Project with capital improvements, efficiency upgrades, cost-effective water management programs, and effective FERC re-licensing in the following manner:

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- a. Research capital improvement opportunities with a focus on new generation and/or transmission, more efficient pumping, and expanded storage. One example of a capital improvement investment is DWR's Tehachapi East Afterbay. This \$78 million project's sole purpose is to provide additional afterbay storage for the "string" of pumping plants in the Central Valley to shift on-peak pumping to preferable off-peak time periods.
 - b. Investigate cost-effective water management opportunities to minimize on-peak pumping and/or yield net system-wide benefits.
 - c. Develop operation, maintenance and spare parts strategies to maximize pumping unit availability for off peak pumping. This lifting includes cumbersome state-personnel and contracting restrictions.
 - d. The CEC could provide a "balancing" voice to groups advocating fish and other environmental interests for FERC re-licensing efforts and other regulatory venues where flows through power plants or where pumped-storage is at risk of being restricted.
- **Small Conduit Energy Recovery:**
The CEC and Metropolitan could jointly research small-conduit energy recovery opportunities along water conveyance facilities within Metropolitan's distribution system.
 - **Water Conservation:**
The CEC could help other state agencies, and regulatory bodies to recognize embedded indirect energy savings in water conservation.
 - a. Metropolitan has a strong water conservation program which could be expanded with CEC-promoted partnerships to achieve both water and energy savings by retrofitting homes, businesses, and landscapes with new water and energy saving technologies.
 - b. The CEC and Metropolitan could advocate developing and implementing new appliance standards that benefit both water and power efficiencies. Currently there is an opportunity for the CEC to be a vocal proponent of the statewide water factor standard that will be set for high-efficiency residential clothes washers in 2007 and 2010. These types of programs and partnerships will promote demand reduction and can be a model for future cooperation by agencies.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

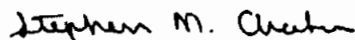
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If you have questions or need additional information, please contact me at (213) 217-6052.

Very truly yours,



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Manager, Water Resource Management

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